

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

Criminal No. 21-10104-PBS

VLADISLAV KLYUSHIN,  
a/k/a “Vladislav Kliushin”  
IVAN ERMAKOV,  
a/k/a “Ivan Yermakov”, and  
NIKOLAI RUMIANTCEV,  
a/k/a “Nikolay Rumyantsev”

Defendants.

GOVERNMENT'S AMENDED WITNESS LIST

The government respectfully submits the following list of witnesses that it intends to call in its case-in-chief. The government reserves the right to amend and/or supplement this list with reasonable notice to the defendant.<sup>1</sup>

Name	Entity/Location/ Representation
Browner, Marc	Kroll Nashville, TN Represented by Peter Altman, Esq., Akin Gump Strauss Hauer & Feld, LLP Los Angeles, CA
Clarke, Maxwell	Securities and Exchange Commission Washington, DC
Cutchins, Devon	Markley Group Los Angeles, CA Represented by Kathleen Hamann, Esq. Pierce Atwood, LLP Washington, D.C.
Garabo, Bryan	Donnelly Financial Services New York, NY Represented by Pravin Rao, Esq., Perkins Coie, LLP, Chicago, IL

<sup>1</sup> In particular, the government reserves the right to call records custodians to the extent necessary absent stipulations.

Hartvigson, Daron	StoneTurn Washington, D.C. Represented by Pravin Rao, Esq., Perkins Coie, LLP, Chicago, IL
Hitchcock, David	Federal Bureau of Investigation Washington, D.C.
Han, Hyeyoung	Donnelly Financial Services Ulsan, South Korea Represented by Pravin Rao, Esq., Perkins Coie, LLP, Chicago, IL
Kenny, Vince	Federal Bureau of Investigation Salt Lake City, UT
Lewis, Jason	Donnelly Financial Services Houston, TX Represented by Pravin Rao, Esq., Perkins Coie, LLP, Chicago, IL
Moschner, Florian	Web2Objects, LLC Seattle, WA
Oliver, Benjamin	Toppan Merrill Eden Prairie, MN Represented by Peter Altman, Esq., Akin Gump Strauss Hauer & Feld, LLP, Los Angeles, CA
Shah, Aditi	Formerly of Micfo, LLC Holly Springs, NC
Soma, Julie	Donnelly Financial Services Seattle, WA Represented by Pravin Rao, Esq., Perkins Coie, LLP, Chicago, IL
Uitto, Eric	Federal Bureau of Investigation Huntsville, AL
Wall, Jacob	StackPath Dallas, TX Represented by Robert Taylor, Esq., Ziff Davis, Los Angeles, CA
Yanochko, Karyn (or other summary witness)	U.S. Attorney's Office Boston, MA
Zorek, Jeffrey	Saxo Bank Sarasota, FL Represented by Seth DuCharme, Esq., Bracewell, LLP, New York, NY

Respectfully submitted,

RACHAEL S. ROLLINS  
United States Attorney

/s/ Seth B. Kosto  
STEPHEN E. FRANK  
SETH B. KOSTO  
Assistant United States Attorneys

CERTIFICATE OF SERVICE

I, Stephen E. Frank, hereby certify that this document was this day filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (“NEF”).

Date: February 3, 2023

/s/ Seth B. Kosto  
Stephen E. Frank